

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE: CHAPTER 13

CHARLES U WATSON SR.,

CASE NO. 15-05462- 5-DMW

DEBTOR.

MOTION TO REOPEN DISCOVERY

NOW COMES Charles U. Watson Sr., Debtor in the above referenced case, by and through undersigned counsel, and respectfully request the Court reopen discovery in reference to his objection to claim 2-1 of Selene Finance, LP Servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-18 (“Creditor”). In support of this motion, the Debtor shows unto the Court as follows:

1. On November 30, 2015, Selene Finance, LP Servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-18 filed Proof of Claim #2-1 in the Debtor’s case in the amount of \$1,125,763.23.

2. The Claim purports to be owned by Selene Finance, LP Servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-18 and secured by the Debtor’s residence located at 2512 Canonbie Lane Wake Forest, NC 27587.

3. On October 4, 2016, the Creditor filed a response to the Debtor’s objection to claim attaching Exhibit 1 that was not included in the Creditor’s proof of claim nor provided during discovery.

4. Exhibit 1, is a promissory note that appears to void a previous endorsement of the note from Chase Bank USA, N.A. to J. P. Morgan Chase Bank, N.A.

5. The Debtor desires to reopen discovery to examine the original promissory note and determine the date of each endorsement and voiding of endorsement.

6. Without further information on the loan, the Debtor is unable to verify the correct owner of the deed of trust and promissory note.

7. The Debtor requests that this Court enter a scheduling order that allows 60 days for the Debtor to conduct discovery on this contested matter.

8. Debtor's counsel has conferred with counsel for Christiana Trust who consents to this motion.

WHEREFORE, the Debtor respectfully request the Court reopen discovery for a period of 60 days and for such further relief as this Court deems just and proper.

This the 31st day of October, 2016.

JANVIER LAW FIRM, PLLC

s/William F. Braziel, III

William P. Janvier, State Bar No. 21136

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion to reopen discovery to claim 2-1 of Selene Finance, LP Servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-18 ("Selene Finance, LP") was served by U.S. Mail, First Class postage, prepaid, or electronically as indicated:

Charles Ural Watson, Sr. 2512 Canonbie Lane Wake Forest, NC 27587	Selene Finance, LP Servicer for Christiana Trust, Attn: Managing Agent 9990 Richmond Avenue, Suite 400S Houston, Texas 77042
William Paul Harris (Via CM/ECF) Shapiro & Ingle, LLP 10130 Perimeter Parkway, Suite 400 Charlotte, NC 28216 704-831-2343 704-831-3343 (fax) wharris@logs.com <i>Attorney for Selene Finance, LP Servicer for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 13-00018 ("Selene Finance, LP")</i>	John F. Logan (Via CM/ECF) Office Of The Chapter 13 Trustee PO Box 61039 Raleigh, NC 27661-1039 919 876-1355 <i>Chapter 13 Trustee</i>

This the 31st day of October, 2016.

JANVIER LAW FIRM, PLLC

s/William F. Braziel, III

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